

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA

v.

KILMAR ARMANDO ABREGO GARCIA,

*Defendant.*

No. 3:25-cr-115

Judge Waverly D. Crenshaw, Jr.

**RESPONSE TO GOVERNMENT'S MOTION FOR PROTECTIVE  
ORDER**

Kilmar Armando Abrego Garcia writes in response to the government's motion for a protective order. ECF 68. On June 30, 2025, the government filed a motion for a protective order and a proposed order, which, among other things, precluded Mr. Abrego from retaining any discovery—including his own statements—and did not permit his criminal defense team to disclose discovery material to witnesses in preparation for, during, or in review of the person's testimony. *Id.*; ECF 68-1. Mr. Abrego believed the government's proposed order was unduly restrictive, and he therefore opposed the motion. ECF 68. This Court subsequently ordered Mr. Abrego to respond to the government's motion and attach a proposed protective order of his own for its consideration. ECF 74.

Since the government filed its motion and proposed protective order, counsel for Mr. Abrego and the government have conferred and negotiated a joint proposed protective order, which is attached as **Exhibit A** to this response.<sup>1</sup> The parties' joint proposed order is distinct from the

---

<sup>1</sup> The parties have also agreed that the government will begin producing discovery to Mr. Abrego, and that

government's proposed protective order insofar as it (a) allows Mr. Abrego to retain copies of his own statements, communications, and the contents of any of his electronic devices or accounts produced by the government in discovery; (b) permits the criminal defense team to disclose discovery material to any witness in this action in preparation for, during, or in review of the person's testimony; and (c) ensures that Mr. Abrego may maintain and use any of his own private documents. There is good cause for the Court to enter the parties' joint proposed order because it simultaneously preserves Mr. Abrego's ability to prepare for trial and addresses privacy and safety concerns the government outlined in its motion. ECF 68. Further, the parties' proposed order comports with previous protective orders this Court has entered in criminal matters. *See, e.g.*, *United States v. Abbott*, No. 2:19-cr-00004 (Apr. 23, 2019), ECF No. 18 (entering protective order allowing the parties to disclose discovery material to “[a]ny person whose testimony was or will be taken in this action” and explaining that order did not prohibit the parties’ “use” of their own confidential documents).

Mr. Abrego therefore respectfully requests that the Court enter the parties' joint proposed protective order, which is attached as **Exhibit A** to this response. Undersigned counsel has conferred with Acting U.S. Attorney Rob McGuire, who concurs with this request.

Dated: July 8, 2025  
New York, New York

Respectfully submitted,

/s/ Sean Hecker  
Sean Hecker  
Jenna Dabbs  
David Patton  
HECKER FINK LLP  
350 Fifth Avenue, 63rd Floor  
New York, NY 10118

---

Mr. Abrego and his criminal defense team will abide by the terms of the joint proposed protective order while it is pending before this Court.

Tel: (212) 763-0883  
Fax: (212) 564-0883  
[shecker@heckerfink.com](mailto:shecker@heckerfink.com)  
[jdabbs@heckerfink.com](mailto:jdabbs@heckerfink.com)  
[dpatton@heckerfink.com](mailto:dpatton@heckerfink.com)

Rascoe Dean  
SHERRARD ROE VOIGT & HARBISON PLLC  
1600 West End Avenue, Suite 1750  
Nashville, Tennessee 37203  
Telephone: (615) 742-4200  
Facsimile: (615) 742-4539  
[rdean@srvhlaw.com](mailto:rdean@srvhlaw.com)

*Counsel for Defendant Kilmar Armando  
Abrego Garcia*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2025, I electronically filed the foregoing document with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following: Acting United States Attorney, Robert E. McGuire, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ Sean Hecker